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*Proposed Counsel for Debtors and Debtors in Possession*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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<b><i>In re</i></b>	:	<b>Chapter 11</b>
	:	
<b>THE McCLATCHY COMPANY,</b>	:	<b>Case No. 20-10418 (MEW)</b>
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<b>Debtor.</b>	:	
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<b>Fed. Tax Id. No. 52-2080478</b>	:	
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*In re* : **Chapter 11**  
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CYPRESS MEDIA, INC., : **Case No. 20-10417 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 37-0742453 :   
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*In re* : **Chapter 11**  
:   
ABOARD PUBLISHING, INC., : **Case No. 20-10419 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 65-1051606 :   
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*In re* : **Chapter 11**  
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BELLINGHAM HERALD PUBLISHING, LLC, : **Case No. 20-10420 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 59-0184700 :   
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*In re* : **Chapter 11**  
:   
BELTON PUBLISHING COMPANY, INC., : **Case No. 20-10421 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 43-1412853 :   
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*In re* : **Chapter 11**  
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**BISCAYNE BAY PUBLISHING, INC.,** : **Case No. 20-10422 (MEW)**  
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**Debtor.** :   
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**Fed. Tax Id. No. 65-1051521** :   
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*In re* : **Chapter 11**  
:   
**CASS COUNTY PUBLISHING COMPANY,** : **Case No. 20-10423 (MEW)**  
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**Debtor.** :   
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**Fed. Tax Id. No. 43-0891076** :   
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*In re* : **Chapter 11**  
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**COLUMBUS-LEDGER ENQUIRER, INC.,** : **Case No. 20-10424 (MEW)**  
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**Debtor.** :   
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**Fed. Tax Id. No. 58-0376130** :   
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*In re* : **Chapter 11**  
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**CYPRESS MEDIA, LLC,** : **Case No. 20-10425 (MEW)**  
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**Debtor.** :   
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**Fed. Tax Id. No. 65-0764225** :   
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*In re* : **Chapter 11**  
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EAST COAST NEWSPAPERS, INC., : **Case No. 20-10426 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 68-0201685 :   
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*In re* : **Chapter 11**  
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EL DORADO NEWSPAPERS, : **Case No. 20-10427 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 94-2605579 :   
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*In re* : **Chapter 11**  
:   
GULF PUBLISHING COMPANY, INC., : **Case No. 20-10428 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 64-0469077 :   
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*In re* : **Chapter 11**  
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HERALD CUSTOM PUBLISHING OF : **Case No. 20-10429 (MEW)**  
MEXICO, S. de R.L. de C.V., :   
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Debtor. :   
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Tax Id. No. HCP001215UZ1 :   
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*In re* : **Chapter 11**  
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HLB NEWSPAPERS, INC., : **Case No. 20-10430 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 43-1675371 :   
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*In re* : **Chapter 11**  
:   
IDAHO STATESMAN PUBLISHING, LLC, : **Case No. 20-10431 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 59-0184700 :   
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*In re* : **Chapter 11**  
:   
KELTATIM PUBLISHING COMPANY, INC., : **Case No. 20-10432 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 48-1161908 :   
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*In re* : **Chapter 11**  
:   
KEYNOTER PUBLISHING COMPANY, INC., : **Case No. 20-10433 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 59-0789679 :   
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*In re* : **Chapter 11**  
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**LEE'S SUMMIT JOURNAL, INCORPORATED,** : **Case No. 20-10434 (MEW)**  
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**Debtor.** :   
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**Fed. Tax Id. No. 44-0534462** :   
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*In re* : **Chapter 11**  
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**LEXINGTON H-L SERVICES, INC.,** : **Case No. 20-10435 (MEW)**  
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**Debtor.** :   
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**Fed. Tax Id. No. 61-0259090** :   
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*In re* : **Chapter 11**  
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**MACON TELEGRAPH PUBLISHING COMPANY,** : **Case No. 20-10436 (MEW)**  
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**Debtor.** :   
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**Fed. Tax Id. No. 58-0333650** :   
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*In re* : **Chapter 11**  
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**MAIL ADVERTISING CORPORATION,** : **Case No. 20-10437 (MEW)**  
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**Debtor.** :   
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**Fed. Tax Id. No. 75-2588187** :   
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*In re* : **Chapter 11**  
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McCLATCHY BIG VALLEY, INC., : **Case No. 20-10438 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 68-0307849 :   
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*In re* : **Chapter 11**  
:   
McCLATCHY INTERACTIVE LLC, : **Case No. 20-10439 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 56-0338580 :   
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*In re* : **Chapter 11**  
:   
McCLATCHY INTERACTIVE WEST, : **Case No. 20-10440 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 65-0683075 :   
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*In re* : **Chapter 11**  
:   
McCLATCHY INTERNATIONAL INC., : **Case No. 20-10441 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 65-0732198 :   
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*In re* : **Chapter 11**  
:   
McCLATCHY INVESTMENT COMPANY, : **Case No. 20-10442 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 51-0274877 :   
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*In re* : **Chapter 11**  
:   
McCLATCHY MANAGEMENT SERVICES, INC., : **Case No. 20-10443 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 52-2360846 :   
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*In re* : **Chapter 11**  
:   
McCLATCHY NEWSPAPERS, INC., : **Case No. 20-10444 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 94-0666175 :   
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*In re* : **Chapter 11**  
:   
McCLATCHY NEWS SERVICES INC., : **Case No. 20-10445 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 38-2022755 :   
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*In re* : **Chapter 11**  
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McCLATCHY PROPERTY, INC., : **Case No. 20-10446 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 65-0789132 :   
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*In re* : **Chapter 11**  
:   
McCLATCHY RESOURCES, INC., : **Case No. 20-10447 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 65-0891517 :   
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*In re* : **Chapter 11**  
:   
McCLATCHY SHARED SERVICES, INC., : **Case No. 20-10448 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 65-0651121 :   
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*In re* : **Chapter 11**  
:   
McCLATCHY U.S.A., INC., : **Case No. 20-10449 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 65-0732197 :   
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*In re* : **Chapter 11**  
:   
MIAMI HERALD MEDIA COMPANY, : **Case No. 20-10450 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 20-5063905 :   
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*In re* : **Chapter 11**  
:   
N & O HOLDINGS, INC., : **Case No. 20-10451 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 52-2360850 :   
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*In re* : **Chapter 11**  
:   
NEWSPRINT VENTURES, INC., : **Case No. 20-10452 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 68-0041100 :   
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*In re* : **Chapter 11**  
:   
NITTANY PRINTING AND PUBLISHING : **Case No. 20-10453 (MEW)**  
COMPANY, :   
Debtor. :   
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Fed. Tax Id. No. 24-0676050 :   
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*In re* : **Chapter 11**  
:   
NOR-TEX PUBLISHING, INC., : **Case No. 20-10454 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 75-1109443 :   
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*In re* : **Chapter 11**  
:   
OLYMPIAN PUBLISHING, LLC, : **Case No. 20-10455 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 59-0184700 :   
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*In re* : **Chapter 11**  
:   
OLYMPIC-CASCADE PUBLISHING, INC., : **Case No. 20-10456 (MEW)**  
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Debtor. :   
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Fed. Tax Id. No. 68-0098889 :   
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*In re* : **Chapter 11**  
:   
PACIFIC NORTHWEST PUBLISHING : **Case No. 20-10457 (MEW)**  
COMPANY, INC., :   
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Debtor. :   
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Fed. Tax Id. No. 59-0184700 :   
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*In re* : **Chapter 11**  
:   
**QUAD COUNTY PUBLISHING, INC.,** : **Case No. 20-10458 (MEW)**  
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:   
**Debtor.** :   
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**Fed. Tax Id. No. 37-1225856** :   
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*In re* : **Chapter 11**  
:   
**SAN LUIS OBISPO TRIBUNE, LLC,** : **Case No. 20-10459 (MEW)**  
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**Debtor.** :   
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**Fed. Tax Id. No. 20-5001401** :   
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*In re* : **Chapter 11**  
:   
**STAR-TELEGRAM, INC.,** : **Case No. 20-10460 (MEW)**  
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:   
**Debtor.** :   
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**Fed. Tax Id. No. 26-2674582** :   
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*In re* : **Chapter 11**  
:   
**TACOMA NEWS, INC.,** : **Case No. 20-10461 (MEW)**  
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**Debtor.** :   
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**Fed. Tax Id. No. 68-0099037** :   
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*In re* : **Chapter 11**  
:   
**THE BRADENTON HERALD, INC.,** : **Case No. 20-10462 (MEW)**  
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**Debtor.** :   
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**Fed. Tax Id. No. 59-1487839** :   
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*In re* : **Chapter 11**  
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**THE CHARLOTTE OBSERVER PUBLISHING** : **Case No. 20-10463 (MEW)**  
**COMPANY,** :   
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**Debtor.** :   
:   
**Fed. Tax Id. No. 56-0612746** :   
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*In re* : **Chapter 11**  
:   
**THE NEWS AND OBSERVER PUBLISHING** : **Case No. 20-10464 (MEW)**  
**COMPANY,** :   
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**Debtor.** :   
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**Fed. Tax Id. No. 56-0338580** :   
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*In re* : **Chapter 11**  
:   
**THE STATE MEDIA COMPANY,** : **Case No. 20-10465 (MEW)**  
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**Debtor.** :   
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**Fed. Tax Id. No. 57-0477517** :   
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*In re*

**THE SUN PUBLISHING COMPANY, INC.,**

**Debtor.**

**Fed. Tax Id. No. 57-0564988**

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*In re*

**TRIBUNE NEWSPRINT COMPANY,**

**Debtor.**

**Fed. Tax Id. No. 87-0415831**

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*In re*

**TRU MEASURE, LLC,**

**Debtor.**

**Fed. Tax Id. No. 65-0683075**

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*In re*

**WICHITA EAGLE AND BEACON PUBLISHING  
COMPANY, INC.,**

**Debtor.**

**Fed. Tax Id. No. 48-0571718**  
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: **Chapter 11**

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: **Case No. 20-10466 (MEW)**

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: **Chapter 11**

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: **Case No. 20-10467 (MEW)**

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: **Chapter 11**

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: **Case No. 20-10468 (MEW)**

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: **Chapter 11**

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: **Case No. 20-10469 (MEW)**

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X

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<i>In re</i>	: <b>Chapter 11</b>
	:
WINGATE PAPER COMPANY,	: <b>Case No. 20-10470 (MEW)</b>
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Debtor.	:
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Fed. Tax Id. No. 68-0068249	:
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**DEBTORS' MOTION FOR ENTRY OF ORDER (I)  
DIRECTING JOINT ADMINISTRATION OF CASES AND  
(II) WAIVING REQUIREMENTS OF BANKRUPTCY CODE  
SECTION 342(c)(1) AND BANKRUPTCY  
RULES 1005 AND 2002(n)**

The McClatchy Company and certain of its affiliates, the debtors and debtors in possession in the above-captioned cases (collectively, the “**Debtors**,” the “**Company**,” or “**McClatchy**”), hereby move (this “**Motion**”) this Court for entry of an order, substantially in the form attached hereto as **Exhibit A** (the “**Proposed Order**”), granting the relief described below. In support of this Motion, the Debtors rely upon and incorporate by reference the *Declaration of Sean M. Harding in Support of Chapter 11 Petitions and First Day Papers* (the “**First Day Declaration**”),<sup>1</sup> filed contemporaneously herewith. In further support of the Motion, the Debtors, by and through their undersigned proposed counsel, respectfully represent as follows:

**RELIEF REQUESTED**

1. The Debtors respectfully request entry of an Order (a) directing the joint administration of the Chapter 11 Cases (as defined below) for procedural purposes only and (b)

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<sup>1</sup> Capitalized terms not otherwise defined herein shall have the meanings ascribed to them in the First Day Declaration.

waiving the requirement that the caption in the Chapter 11 Cases and certain notices list the Debtors' tax identification numbers.

2. In furtherance of the foregoing, the Debtors request that the official caption to be used by all parties in all papers in the joint administered cases be as follows:

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----	<b>x</b>
<b><i>In re</i></b>	<b>: Chapter 11</b>
	<b>:</b>
<b>THE McCLATCHY COMPANY, <i>et al.</i>,</b>	<b>: Case No. 20-10418 (MEW)</b>
	<b>:</b>
<b>Debtors.<sup>1</sup></b>	<b>: (Joint Administration Pending)</b>
	<b>:</b>
-----	<b>x</b>

3. In addition, the Debtors request that the Court make a docket entry in each of the Chapter 11 Cases (except that of The McClatchy Company) substantially as follows:

An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure directing joint administration for procedural purposes only of the chapter 11 cases of: The McClatchy Company, Case No. 20-10418 (MEW); Cypress Media, Inc., Case No. 20-10417 (MEW); Aboard Publishing, Inc., Case No. 20-10419 (MEW); Bellingham Herald Publishing, LLC, Case No. 20-10420 (MEW); Belton Publishing Company, Inc., Case No. 20-10421 (MEW); Biscayne Bay Publishing, Inc., Case No. 20-10422 (MEW); Cass County Publishing Company, Case No. 20-10423 (MEW); Columbus-Ledger Enquirer, Inc., Case No. 20-10424 (MEW); Cypress Media, LLC, Case No. 20-10425 (MEW); East Coast Newspapers, Inc., Case No. 20-10426 (MEW); El Dorado Newspapers, Case No. 20-10427 (MEW); Gulf Publishing Company, Inc., Case No. 20-10428 (MEW); Herald Custom Publishing of Mexico, S. de R.L. de C.V., Case No. 20-10429 (MEW); HLB Newspapers, Inc., Case No. 20-10430 (MEW); Idaho Statesman

<sup>1</sup> The last four digits of Debtor The McClatchy Company's tax identification number are 0478. Due to the large number of debtor entities in these chapter 11 cases, for which the Debtors have requested joint administration, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' proposed claims and noticing agent at <http://www.kccllc.net/McClatchy>. The location of the Debtors' service address for purposes of these chapter 11 cases is: 2100 Q Street, Sacramento, California 95816.

Publishing, LLC, Case No. 20-10431 (MEW); Keltatim Publishing Company, Inc., Case No. 20-10432 (MEW); Keynoter Publishing Company, Inc., Case No. 20-10433 (MEW); Lee's Summit Journal, Incorporated, Case No. 20-10434 (MEW); Lexington H-L Services, Inc., Case No. 20-10435 (MEW); Macon Telegraph Publishing Company, Case No. 20-10436 (MEW); Mail Advertising Corporation, Case No. 20-10437 (MEW); McClatchy Big Valley, Inc., Case No. 20-10438 (MEW); McClatchy Interactive LLC, Case No. 20-10439 (MEW); McClatchy Interactive West, Case No. 20-10440 (MEW); McClatchy International Inc., Inc., Case No. 20-10441 (MEW); McClatchy Investment Company, Case No. 20-10442 (MEW); McClatchy Management Services, Inc., Case No. 20-10443 (MEW); McClatchy Newspapers, Inc., Case No. 20-10444 (MEW); McClatchy News Services, Inc., Case No. 20-10445 (MEW); McClatchy Property, Inc., Case No. 20-10446 (MEW); McClatchy Resources, Inc., Case No. 20-10447 (MEW); McClatchy Shared Services, Inc., Case No. 20-10448 (MEW); McClatchy U.S.A., Inc., Case No. 20-10449 (MEW); Miami Herald Media Company, Case No. 20-10450 (MEW); N & O Holdings, Inc., Case No. 20-10451 (MEW); Newsprint Ventures, Inc., Case No. 20-10452 (MEW); Nittany Printing and Publishing Company, Case No. 20-10453 (MEW); Nor-Tex Publishing, Inc., Case No. 20-10454 (MEW); Olympian Publishing, LLC, Case No. 20-10455 (MEW); Olympic-Cascade Publishing, Inc., Case No. 20-10456 (MEW); Pacific Northwest Publishing Company, Inc., Case No. 20-10457 (MEW); Quad County Publishing, Inc., Case No. 20-10458 (MEW); San Luis Obispo Tribune, LLC, Case No. 20-10459 (MEW); Star-Telegram, Inc., Case No. 20-10460 (MEW); Tacoma News, Inc., Case No. 20-10461 (MEW); The Bradenton Herald, Inc., Case No. 20-10462 (MEW); The Charlotte Observer Publishing Company, Case No. 20-10463 (MEW); The News and Observer Publishing Company, Case No. 20-10464 (MEW); The State Media Company, Case No. 20-10465 (MEW); The Sun Publishing Company, Inc., Case No. 20-10466 (MEW); Tribune Newsprint Company, Case No. 20-10467 (MEW); Tru Measure, LLC, Case No. 20-10468 (MEW); Wichita Eagle and Beacon Publishing Company, Inc., Case No. 20-10469 (MEW); Wingate Paper Company, Case No. 20-10470 (MEW). The docket for The McClatchy Company, Case No. 20-10418 (MEW), should be consulted for all matters affecting these cases.

### **JURISDICTION AND VENUE**

4. This Court has jurisdiction to consider the Motion pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, dated January 31, 2012. The Debtors confirm their consent, pursuant to Rule 7008 of the Federal Rules of Bankruptcy Procedure (the “**Bankruptcy Rules**”), to the entry of a final order by the Court in connection with this motion to the extent that it is later determined that the Court, absent consent of the parties, cannot enter final orders or

judgments in connection herewith consistent with Article III of the United States Constitution.

This is a core proceeding under 28 U.S.C. § 157(b).

5. Venue of these cases and this Motion in this district is proper under 28 U.S.C. §§ 1409 and 1409.

6. The legal predicates for the relief requested herein are section 105(a) of title 11 of the United States Code (the “**Bankruptcy Code**”), Bankruptcy Rule 1015(b), and Rule 9013-1(a) of the Local Bankruptcy Rules for the Southern District of New York (the “**Local Bankruptcy Rules**”).

### **BACKGROUND**

7. On the date hereof (the “**Petition Date**”) each Debtor commenced a case by filing a petition for relief under chapter 11 of the Bankruptcy Code (collectively, the “**Chapter 11 Cases**”). The Debtors have requested that the Chapter 11 Cases be jointly administered.

8. The Debtors continue to operate their businesses and manage their properties as debtors and debtors in possession pursuant to Bankruptcy Code sections 1107(a) and 1108.

9. To date, the Office of the United States Trustee for the Southern District of New York (the “**U.S. Trustee**”) has not appointed a creditors’ committee in the Chapter 11 Cases, nor has any trustee or examiner been appointed therein.

10. The McClatchy Company and its direct and indirect Debtor subsidiaries are a diversified digital and print media business, focused on providing strong, independent local journalism to 30 communities across 14 states, as well as national news coverage through the Debtors’ Washington D.C. based bureau. The Debtors also provide a full suite of both local and nationwide digital marketing services. The Debtors’ businesses are comprised of websites and mobile applications, mobile news and advertising, video products, a digital marketing agency, daily newspapers, niche publications, other print and digital direct marketing services and

community newspapers. The Company's business operations, corporate and capital structures, and restructuring efforts are described in greater detail in the First Day Declaration.

### **BASIS FOR RELIEF REQUESTED AND APPLICABLE AUTHORITY**

11. If two or more petitions are pending in the same court by or against a debtor and an affiliate, the court may order the joint administration of the estates of the debtor and such affiliates. Fed. R. Bankr. P. 1015(b). The 54 Debtors are "affiliates" of each other as that term is defined in Bankruptcy Code section 101(2) and as used in Bankruptcy Rule 1015(b). Thus, joint administration of the Debtors' Chapter 11 Cases is appropriate under Bankruptcy Rule 1015(b).

12. The joint administration of the Chapter 11 Cases will promote efficiency by permitting the Clerk of the Court to use a single, general docket for the cases and to combine notice to creditors and other parties-in-interest of the Debtors' respective estates. The Debtors anticipate that almost all of the papers, hearings, and orders in the Chapter 11 Cases will relate to all of the Debtors. Moreover, the use of the simplified caption set forth above will eliminate cumbersome and confusing procedures and ensure a uniformity of pleading identification.

13. The rights of the respective creditors and stakeholders of each of the Debtors will not be adversely affected by joint administration of these cases because the relief sought is purely procedural and will not affect parties' substantive rights.

14. This and other courts have granted similar relief in other cases. *See, e.g., In re Stearns Holdings, LLC*, No. 19-12226 (SCC) (Bankr. S.D.N.Y. Jul. 10, 2019); *In re Trident Holding Co., LLC*, No. 19-10384 (SHL) (Bankr. S.D.N.Y. Feb. 12, 2019); *In re Synergy Pharmaceuticals, Inc.*, No. 18-14010 (JLG) (Bankr. S.D.N.Y. Dec. 14, 2018); *In re Sears Holdings Corp.*, No. 18-23538 (RDD) (Bankr. S.D.N.Y. Oct. 16, 2018); *In re Chassix Holdings, Inc.*, No. 15-10578 (MEW) (Bankr. S.D.N.Y. Mar. 12, 2015); *In re NII Holdings, Inc.*, No. 14-

12611 (SCC) (Bankr. S.D.N.Y. Sept. 16, 2014); *In re Genco Shipping & Trading Ltd.*, No. 14-11108 (SHL) (Bankr. S.D.N.Y. Apr. 23, 2014).

### **MOTION PRACTICE**

15. This Motion includes citations to the applicable rules and statutory authorities upon which the relief requested herein is predicated, and a discussion of their application to this Motion. Accordingly, the Debtors submit that this Motion satisfies Local Bankruptcy Rule 9013-1(a).

### **RESERVATION OF RIGHTS**

16. Nothing in this Motion should be construed as (a) authority to assume or reject any executory contract or unexpired lease of real property, or as a request for the same; (b) an admission as to the validity, priority, or character of any claim or other asserted right or obligation, or a waiver or other limitation on the Debtors' or any other party in interest's ability to contest the same on any ground permitted by bankruptcy or applicable non-bankruptcy law; (c) a promise to pay any claim; (d) granting third party beneficiary status or bestowing any additional rights on any third party; or (e) being otherwise enforceable by any third party.

### **NOTICE**

17. Notice of this Motion will be given to: (a) the U.S. Trustee, (b) counsel to the DIP Agent, (c) counsel to the Prepetition Agents, (d) counsel to Chatham, (e) counsel to Brigade, (f) the PBGC, (g) the parties included on the Debtors' consolidated list of their 30 largest unsecured creditors, (h) any party that has requested notice pursuant to Bankruptcy Rule 2002, (i) the Banks, and (j) all parties entitled to notice pursuant to Local Bankruptcy Rule 9013-1(b). The Debtors submit that no other or further notice is required.

**NO PRIOR REQUEST**

18. No previous request for the relief sought herein has been made to this Court or any other court.

***[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]***

## CONCLUSION

The Debtors respectfully request that this Court enter the Order, substantially in the form annexed hereto, granting the relief requested herein and such other and further relief as may be just and proper.

Dated: New York, New York  
February 13, 2020

SKADDEN, ARPS, SLATE, MEAGHER & FLOM LLP

/s/ Van C. Durrer, II

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Bram A. Storchlic  
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– and –

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– and –

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– and –

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Kyle J. Ortiz  
Amy Oden  
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Telephone: (212) 594-5000  
Fax: (212) 967-4258

*Proposed Counsel to Debtors and Debtors in Possession*

**Exhibit A**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----	X	
<i>In re</i>	:	<b>Chapter 11</b>
	:	
THE McCLATCHY COMPANY,	:	<b>Case No. 20-10418 (MEW)</b>
	:	
Debtor.	:	
	:	
Fed. Tax Id. No. 52-2080478	:	
	:	
-----	X	
<i>In re</i>	:	<b>Chapter 11</b>
	:	
CYPRESS MEDIA, INC.,	:	<b>Case No. 20-10417 (MEW)</b>
	:	
Debtor.	:	
	:	
Fed. Tax Id. No. 37-0742453	:	
	:	
-----	X	
<i>In re</i>	:	<b>Chapter 11</b>
	:	
ABOARD PUBLISHING, INC.,	:	<b>Case No. 20-10419 (MEW)</b>
	:	
Debtor.	:	
	:	
Fed. Tax Id. No. 65-1051606	:	
	:	
-----	X	
<i>In re</i>	:	<b>Chapter 11</b>
	:	
BELLINGHAM HERALD PUBLISHING, LLC,	:	<b>Case No. 20-10420 (MEW)</b>
	:	
Debtor.	:	
	:	
Fed. Tax Id. No. 59-0184700	:	
	:	
-----	X	

----- X  
*In re* : **Chapter 11**  
:   
BELTON PUBLISHING COMPANY, INC., : **Case No. 20-10421 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 43-1412853 :   
:   
----- X

*In re* : **Chapter 11**  
:   
BISCAYNE BAY PUBLISHING, INC., : **Case No. 20-10422 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 65-1051521 :   
:   
----- X

*In re* : **Chapter 11**  
:   
CASS COUNTY PUBLISHING COMPANY, : **Case No. 20-10423 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 43-0891076 :   
:   
----- X

*In re* : **Chapter 11**  
:   
COLUMBUS-LEDGER ENQUIRER, INC., : **Case No. 20-10424 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 58-0376130 :   
:   
----- X

----- X  
*In re* : **Chapter 11**  
:   
CYPRESS MEDIA, LLC, : **Case No. 20-10425 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 65-0764225 :   
:   
----- X

*In re* : **Chapter 11**  
:   
EAST COAST NEWSPAPERS, INC., : **Case No. 20-10426 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 68-0201685 :   
:   
----- X

*In re* : **Chapter 11**  
:   
EL DORADO NEWSPAPERS, : **Case No. 20-10427 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 94-2605579 :   
:   
----- X

*In re* : **Chapter 11**  
:   
GULF PUBLISHING COMPANY, INC., : **Case No. 20-10428 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 64-0469077 :   
:   
----- X

-----	X	
<i>In re</i>	:	<b>Chapter 11</b>
	:	
<b>HERALD CUSTOM PUBLISHING OF</b>	:	<b>Case No. 20-10429 (MEW)</b>
<b>MEXICO, S. de R.L. de C.V.,</b>	:	
	:	
<b>Debtor.</b>	:	
	:	
<b>Tax Id. No. HCP001215UZ1</b>	:	
	:	
-----	X	
<i>In re</i>	:	<b>Chapter 11</b>
	:	
<b>HLB NEWSPAPERS, INC.,</b>	:	<b>Case No. 20-10430 (MEW)</b>
	:	
	:	
<b>Debtor.</b>	:	
	:	
<b>Fed. Tax Id. No. 43-1675371</b>	:	
	:	
-----	X	
<i>In re</i>	:	<b>Chapter 11</b>
	:	
<b>IDAHO STATESMAN PUBLISHING, LLC,</b>	:	<b>Case No. 20-10431 (MEW)</b>
	:	
	:	
<b>Debtor.</b>	:	
	:	
<b>Fed. Tax Id. No. 59-0184700</b>	:	
	:	
-----	X	
<i>In re</i>	:	<b>Chapter 11</b>
	:	
<b>KELTATIM PUBLISHING COMPANY, INC.,</b>	:	<b>Case No. 20-10432 (MEW)</b>
	:	
	:	
<b>Debtor.</b>	:	
	:	
<b>Fed. Tax Id. No. 48-1161908</b>	:	
	:	
-----	X	

----- X  
*In re* : **Chapter 11**  
:   
**KEYNOTER PUBLISHING COMPANY, INC.,** : **Case No. 20-10433 (MEW)**  
:   
:   
**Debtor.** :   
:   
**Fed. Tax Id. No. 59-0789679** :   
:   
----- X

*In re* : **Chapter 11**  
:   
**LEE'S SUMMIT JOURNAL, INCORPORATED,** : **Case No. 20-10434 (MEW)**  
:   
:   
**Debtor.** :   
:   
**Fed. Tax Id. No. 44-0534462** :   
:   
----- X

*In re* : **Chapter 11**  
:   
**LEXINGTON H-L SERVICES, INC.,** : **Case No. 20-10435 (MEW)**  
:   
:   
**Debtor.** :   
:   
**Fed. Tax Id. No. 61-0259090** :   
:   
----- X

*In re* : **Chapter 11**  
:   
**MACON TELEGRAPH PUBLISHING COMPANY,** : **Case No. 20-10436 (MEW)**  
:   
:   
**Debtor.** :   
:   
**Fed. Tax Id. No. 58-0333650** :   
:   
----- X

----- X  
*In re* : **Chapter 11**  
:   
MAIL ADVERTISING CORPORATION, : **Case No. 20-10437 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 75-2588187 :   
:   
----- X

*In re* : **Chapter 11**  
:   
McCLATCHY BIG VALLEY, INC., : **Case No. 20-10438 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 68-0307849 :   
:   
----- X

*In re* : **Chapter 11**  
:   
McCLATCHY INTERACTIVE LLC, : **Case No. 20-10439 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 56-0338580 :   
:   
----- X

*In re* : **Chapter 11**  
:   
McCLATCHY INTERACTIVE WEST, : **Case No. 20-10440 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 65-0683075 :   
:   
----- X

----- X  
*In re* : **Chapter 11**  
:   
McCLATCHY INTERNATIONAL INC., : **Case No. 20-10441 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 65-0732198 :   
:   
----- X

*In re* : **Chapter 11**  
:   
McCLATCHY INVESTMENT COMPANY, : **Case No. 20-10442 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 51-0274877 :   
:   
----- X

*In re* : **Chapter 11**  
:   
McCLATCHY MANAGEMENT SERVICES, INC., : **Case No. 20-10443 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 52-2360846 :   
:   
----- X

*In re* : **Chapter 11**  
:   
McCLATCHY NEWSPAPERS, INC., : **Case No. 20-10444 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 94-0666175 :   
:   
----- X

----- X  
*In re* : **Chapter 11**  
:   
McCLATCHY NEWS SERVICES, INC., : **Case No. 20-10445 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 38-2022755 :   
:   
----- X

*In re* : **Chapter 11**  
:   
McCLATCHY PROPERTY, INC., : **Case No. 20-10446 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 65-0789132 :   
:   
----- X

*In re* : **Chapter 11**  
:   
McCLATCHY RESOURCES, INC., : **Case No. 20-10447 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 65-0891517 :   
:   
----- X

*In re* : **Chapter 11**  
:   
McCLATCHY SHARED SERVICES, INC., : **Case No. 20-10448 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 65-0651121 :   
:   
----- X

----- X  
*In re* : **Chapter 11**  
:   
McCLATCHY U.S.A., INC., : **Case No. 20-10449 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 65-0732197 :   
:   
----- X

*In re* : **Chapter 11**  
:   
MIAMI HERALD MEDIA COMPANY, : **Case No. 20-10450 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 20-5063905 :   
:   
----- X

*In re* : **Chapter 11**  
:   
N & O HOLDINGS, INC., : **Case No. 20-10451 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 65-2360850 :   
:   
----- X

*In re* : **Chapter 11**  
:   
NEWSPRINT VENTURES, INC., : **Case No. 20-10452 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 68-0041100 :   
:   
----- X

-----	X	
<i>In re</i>	:	<b>Chapter 11</b>
	:	
<b>NITTANY PRINTING AND PUBLISHING COMPANY,</b>	:	<b>Case No. 20-10453 (MEW)</b>
	:	
<b>Debtor.</b>	:	
	:	
<b>Fed. Tax Id. No. 24-0676050</b>	:	
	:	
-----	X	
<i>In re</i>	:	<b>Chapter 11</b>
	:	
<b>NOR-TEX PUBLISHING, INC.,</b>	:	<b>Case No. 20-10454 (MEW)</b>
	:	
<b>Debtor.</b>	:	
	:	
<b>Fed. Tax Id. No. 75-1109443</b>	:	
	:	
-----	X	
<i>In re</i>	:	<b>Chapter 11</b>
	:	
<b>OLYMPIAN PUBLISHING, LLC,</b>	:	<b>Case No. 20-10455 (MEW)</b>
	:	
<b>Debtor.</b>	:	
	:	
<b>Fed. Tax Id. No. 59-0184700</b>	:	
	:	
-----	X	
<i>In re</i>	:	<b>Chapter 11</b>
	:	
<b>OLYMPIC-CASCADE PUBLISHING, INC.,</b>	:	<b>Case No. 20-10456 (MEW)</b>
	:	
<b>Debtor.</b>	:	
	:	
<b>Fed. Tax Id. No. 68-0098889</b>	:	
	:	
-----	X	

-----	X	
<i>In re</i>	:	<b>Chapter 11</b>
	:	
<b>PACIFIC NORTHWEST PUBLISHING</b>	:	<b>Case No. 20-10457 (MEW)</b>
<b>COMPANY, INC.,</b>	:	
	:	
<b>Debtor.</b>	:	
	:	
<b>Fed. Tax Id. No. 59-0184700</b>	:	
	:	
-----	X	
<i>In re</i>	:	<b>Chapter 11</b>
	:	
<b>QUAD COUNTY PUBLISHING, INC.,</b>	:	<b>Case No. 20-10458 (MEW)</b>
	:	
	:	
<b>Debtor.</b>	:	
	:	
<b>Fed. Tax Id. No. 37-1225856</b>	:	
	:	
-----	X	
<i>In re</i>	:	<b>Chapter 11</b>
	:	
<b>SAN LUIS OBISPO TRIBUNE, LLC,</b>	:	<b>Case No. 20-10459 (MEW)</b>
	:	
	:	
<b>Debtor.</b>	:	
	:	
<b>Fed. Tax Id. No. 20-5001401</b>	:	
	:	
-----	X	
<i>In re</i>	:	<b>Chapter 11</b>
	:	
<b>STAR-TELEGRAM, INC.,</b>	:	<b>Case No. 20-10460 (MEW)</b>
	:	
	:	
<b>Debtor.</b>	:	
	:	
<b>Fed. Tax Id. No. 26-2674582</b>	:	
	:	
-----	X	

----- X  
*In re* : **Chapter 11**  
:   
TACOMA NEWS, INC., : **Case No. 20-10461 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 68-0099037 :   
:   
----- X

*In re* : **Chapter 11**  
:   
THE BRADENTON HERALD, INC., : **Case No. 20-10462 (MEW)**  
:   
:   
Debtor. :   
:   
Fed. Tax Id. No. 59-1487839 :   
:   
----- X

*In re* : **Chapter 11**  
:   
THE CHARLOTTE OBSERVER PUBLISHING : **Case No. 20-10463 (MEW)**  
COMPANY, :   
:   
Debtor. :   
:   
Fed. Tax Id. No. 56-0612746 :   
:   
----- X

*In re* : **Chapter 11**  
:   
THE NEWS AND OBSERVER PUBLISHING : **Case No. 20-10464 (MEW)**  
COMPANY, :   
:   
Debtor. :   
:   
Fed. Tax Id. No. 56-0338580 :   
:   
----- X

-----  
*In re*

**THE STATE MEDIA COMPANY,**

**Debtor.**

**Fed. Tax Id. No. 57-0477517**

-----  
*In re*

**THE SUN PUBLISHING COMPANY, INC.,**

**Debtor.**

**Fed. Tax Id. No. 57-0564988**

-----  
*In re*

**TRIBUNE NEWSPRINT COMPANY,**

**Debtor.**

**Fed. Tax Id. No. 87-0415831**

-----  
*In re*

**TRU MEASURE, LLC,**

**Debtor.**

**Fed. Tax Id. No. 65-0683075**  
-----

X

: **Chapter 11**

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: **Case No. 20-10465 (MEW)**

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X

: **Chapter 11**

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: **Case No. 20-10466 (MEW)**

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X

: **Chapter 11**

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: **Case No. 20-10467 (MEW)**

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X

: **Chapter 11**

:

: **Case No. 20-10468 (MEW)**

:

:

:

:

:

:

:

X

-----	X
<i>In re</i>	: Chapter 11
	:
WICHITA EAGLE AND BEACON PUBLISHING	: Case No. 20-10469 (MEW)
COMPANY, INC.,	:
	:
Debtor.	:
	:
Fed. Tax Id. No. 48-0571718	:
	:
-----	X
<i>In re</i>	: Chapter 11
	:
WINGATE PAPER COMPANY,	: Case No. 20-10470 (MEW)
	:
	:
Debtor.	:
	:
Fed. Tax Id. No. 68-0068249	:
	:
-----	X

**ORDER (I) DIRECTING JOINT ADMINISTRATION OF  
CASES AND (II) WAIVING REQUIREMENTS OF  
BANKRUPTCY CODE SECTION 342(c)(1) AND  
BANKRUPTCY RULES 1005 AND 2002(n)**

Upon the motion (the “**Motion**”)<sup>1</sup> of the Debtors for an order (this “**Order**”)

(i) directing joint administration of these cases and administratively consolidating the respective Chapter 11 Cases of each Debtor for procedural purposes only and (ii) waiving the requirement that the captions in the Chapter 11 Cases list the Debtors’ tax identification numbers and certain other information; and upon consideration of the First Day Declaration; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference from the United States District Court for the Southern District of New York*, dated January 31, 2012; and this Court having found that this is a core proceeding pursuant to 28

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<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to such terms in the Motion.

U.S.C. § 157(b)(2), and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Motion in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and due and sufficient notice of the Motion having been given under the particular circumstances; and it appearing that no other or further notice is necessary; and it appearing that the relief requested in the Motion is in the best interests of the Debtors, their estates, their creditors, and other parties-in-interest; and after due deliberation thereon; and good and sufficient cause appearing therefor; it is hereby;

**ORDERED, ADJUDGED, AND DECREED that:**

1. The Motion is GRANTED on a final basis as set forth herein.
2. Each of the above-captioned Chapter 11 Cases of the Debtors be, and hereby is, jointly administered by the Court for procedural purposes only. Nothing contained in this Order shall be deemed or construed as directing or otherwise effecting any substantive consolidation of any of the Chapter 11 Cases.
3. The caption of the jointly administered cases shall read as follows:

***[REMAINDER OF PAGE INTENTIONALLY LEFT BLANK]***

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----	<b>x</b>	
<b><i>In re</i></b>	<b>:</b>	<b>Chapter 11</b>
	<b>:</b>	
<b>THE McCLATCHY COMPANY, <i>et al.</i>,</b>	<b>:</b>	<b>Case No. 20-10418 (MEW)</b>
	<b>:</b>	
<b>Debtors.<sup>1</sup></b>	<b>:</b>	<b>(Joint Administration Pending)</b>
	<b>:</b>	
-----	<b>x</b>	

4. Each motion, application, and notice shall be captioned as indicated in the preceding decretal paragraph and all original docket entries shall be made in the case of The McClatchy Company, Case No. 20-10418 (MEW).

5. A docket entry shall be made in each of the Chapter 11 Cases (except that of The McClatchy Company) substantially as follows:

An order has been entered in accordance with Rule 1015(b) of the Federal Rules of Bankruptcy Procedure directing joint administration for procedural purposes only of the chapter 11 cases of: The McClatchy Company, Case No. 20-10418 (MEW); Cypress Media, Inc., Case No. 20-10417 (MEW); Aboard Publishing, Inc., Case No. 20-10419 (MEW); Bellingham Herald Publishing, LLC, Case No. 20-10420 (MEW); Belton Publishing Company, Inc., Case No. 20-10421 (MEW); Biscayne Bay Publishing, Inc., Case No. 20-10422 (MEW); Cass County Publishing Company, Case No. 20-10423 (MEW); Columbus-Ledger Enquirer, Inc., Case No. 20-10424 (MEW); Cypress Media, LLC, Case No. 20-10425 (MEW); East Coast Newspapers, Inc., Case No. 20-10426 (MEW); El Dorado Newspapers, Case No. 20-10427 (MEW); Gulf Publishing Company, Inc., Case No. 20-10428 (MEW); Herald Custom Publishing of Mexico, S. de R.L. de C.V., Case No. 20-10429 (MEW); HLB Newspapers, Inc., Case No. 20-10430 (MEW); Idaho Statesman Publishing, LLC, Case No. 20-10431 (MEW); Keltatim Publishing Company, Inc., Case No. 20-10432 (MEW); Keynoter Publishing Company, Inc., Case No. 20-10433 (MEW); Lee's Summit Journal, Incorporated, Case No. 20-10434 (MEW);

<sup>1</sup> The last four digits of Debtor The McClatchy Company's tax identification number are 0478. Due to the large number of debtor entities in these chapter 11 cases, for which the Debtors have requested joint administration, a complete list of the debtor entities and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' proposed claims and noticing agent at <http://www.kccllc.net/McClatchy>. The location of the Debtors' service address for purposes of these chapter 11 cases is: 2100 Q Street, Sacramento, California 95816.

Lexington H-L Services, Inc., Case No. 20-10435 (MEW); Macon Telegraph Publishing Company, Case No. 20-10436 (MEW); Mail Advertising Corporation, Case No. 20-10437 (MEW); McClatchy Big Valley, Inc., Case No. 20-10438 (MEW); McClatchy Interactive LLC, Case No. 20-10439 (MEW); McClatchy Interactive West, Case No. 20-10440 (MEW); McClatchy International Inc., Inc., Case No. 20-10441 (MEW); McClatchy Investment Company, Case No. 20-10442 (MEW); McClatchy Management Services, Inc., Case No. 20-10443 (MEW); McClatchy Newspapers, Inc., Case No. 20-10444 (MEW); McClatchy News Services, Inc., Case No. 20-10445 (MEW); McClatchy Property, Inc., Case No. 20-10446 (MEW); McClatchy Resources, Inc., Case No. 20-10447 (MEW); McClatchy Shared Services, Inc., Case No. 20-10448 (MEW); McClatchy U.S.A., Inc., Case No. 20-10449 (MEW); Miami Herald Media Company, Case No. 20-10450 (MEW); N & O Holdings, Inc., Case No. 20-10451 (MEW); Newsprint Ventures, Inc., Case No. 20-10452 (MEW); Nittany Printing and Publishing Company, Case No. 20-10453 (MEW); Nor-Tex Publishing, Inc., Case No. 20-10454 (MEW); Olympian Publishing, LLC, Case No. 20-10455 (MEW); Olympic-Cascade Publishing, Inc., Case No. 20-10456 (MEW); Pacific Northwest Publishing Company, Inc., Case No. 20-10457 (MEW); Quad County Publishing, Inc., Case No. 20-10458 (MEW); San Luis Obispo Tribune, LLC, Case No. 20-10459 (MEW); Star-Telegram, Inc., Case No. 20-10460 (MEW); Tacoma News, Inc., Case No. 20-10461 (MEW); The Bradenton Herald, Inc., Case No. 20-10462 (MEW); The Charlotte Observer Publishing Company, Case No. 20-10463 (MEW); The News and Observer Publishing Company, Case No. 20-10464 (MEW); The State Media Company, Case No. 20-10465 (MEW); The Sun Publishing Company, Inc., Case No. 20-10466 (MEW); Tribune Newsprint Company, Case No. 20-10467 (MEW); Tru Measure, LLC, Case No. 20-10468 (MEW); Wichita Eagle and Beacon Publishing Company, Inc., Case No. 20-10469 (MEW); Wingate Paper Company, Case No. 20-10470 (MEW). The docket for The McClatchy Company, Case No. 20-10418 (MEW), should be consulted for all matters affecting these cases.

6. One consolidated docket, one file, and one consolidated service list shall be maintained by the Debtors and kept by the Clerk of the Court with the assistance of the notice and claims agent retained by the Debtors in these chapter 11 cases.

7. The requirements under Bankruptcy Code section 342(c)(1) and Bankruptcy Rule 2002(n) that the case caption and other notices mailed in the Chapter 11 Cases include the Debtors' tax identification numbers and other identifying information about the Debtors are hereby waived. The Debtors shall include in all papers filed and each notice mailed by the

Debtors a footnote listing all of the Debtors, the last four digits of their respective tax identification numbers, and the address of their corporate headquarters.

8. The Debtors are authorized and empowered to take all actions necessary to implement the relief granted in this Order.

9. This Court shall retain exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, or enforcement of this Order.

Dated: New York, New York  
February \_\_\_\_, 2020

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UNITED STATES BANKRUPTCY JUDGE